

AIR QUALITY PUBLIC HEARING
October 15, 2013 10:00 a.m.

Staff Attending:

Kathy Van Dame, hearing officer
Mark Berger
Melissa Yazhe
Patrick Barickman
Lance Avey
Bill Reiss
Joe Thomas
Bryce Bird
John Jenks
Dave McNeill
Rusty Ruby

Richard Valentine, Salt County Health Department

Thank you Kathy we appreciate the opportunity to comment today.

The Salt Lake County Health Department appreciates the efforts of the State Division of Air Quality has expended in developing the state implementation plan. We know that a great deal of effort has gone into this project. The effort that the DAQ has made to increase comprehension, communication, commitment with regard to air quality improvement will result in change.

One effort that we believe can continue to bring additional reductions is the participation of community leaders and existing organizations in facilitating the development of and participation in carpools. This will be particularly useful on days that the State Division of Air Quality will forecast an air quality action day.

There are many organizations and governments that have an interest in helping to reduce the impacts to public health from high levels of air pollutions. Many organizations have aims and in fact primary missions that are very much in harmony with reducing levels of air pollution. These organizations can have a great deal of influence on the cooperation and participation of their members.

In the past our communities have demonstrated their ability to help. During the winter Olympics of 2002 where it was known in advance the number of vehicles on the road needed to be reduced, individuals, families, organizations, and governments in the state responded by making the necessary changes.

The floods of 1983 provide another illustration of the ability of our community to respond. In this situation existing organizations were able to deliver thousands of volunteers to respond very quickly to a pressing need.

In terms of advance notice our current situation is somewhere in the middle of these two examples from the past. We know that air action days are coming so we can prepare and practice for them in advance. We don't know exactly when they are coming so we have an element of surprise.

Enhanced outreach to existing organizations including local governments, religious organizations, service organizations, educational institutions, business organizations, and employers, and others to develop and promote carpooling could significantly reduce vehicle travel on air action days.

The Utah Department of Transportation has already demonstrated that these efforts can be successful. They documented an average reduction of approximately 4% on air action days in 2012. One thing that is somewhat unique in the Utah urban areas is the preexisting organization of the neighborhoods. This allows neighbors who live close together to carpool to the same general location. Thank you.

Ingrid Giffie, Utah Moms for Clean Air

Thank you, my name is Ingrid Griffie and I'm here representing Utah Moms for Clean Air.

Utah Moms for Clean Air thanks the DAQ for their efforts in creating this plan. It has a lot of components. However, we wanted to point out that the real point of cleaning our air is not to pass some hurdle by the EPA. The real point is to create healthy air for our families in the short term as well as the long term.

We see the plan shows us squeaking by attainment by the year 2019. My kids will be nearly grown by then. My kids don't come with a pause button and their lungs need clean air this winter. We see that the plan relies heavily on the new Tier 3 automobile emissions standards. Unfortunately, the average car on the road in America right now is over eleven years old. And so by the time we reap the benefits of those new standards my children's childhood will be mostly finished.

Why wait for the cars of 2 million some people to switch over before we reap those benefits when we could ask a small handful, maybe a dozen, existing industries in our airshed to reduce their emissions further. Why don't we do both of those things. Why don't we wait for the cars to turn over and ask industry to reduce their emissions further?

The mission of the DEQ includes safeguarding human health and the quality of life and I take that to mean for my children today and now, not for my grandchildren or their children. Thank you.

Christopher Thomas, HEAL Utah

Good morning. My name is Christopher Thomas. I'm the executive director of HEAL Utah and we will be submitting longer written comments but I've got some brief thoughts to share with you this morning and thank you.

I want to preface my comments by saying that you know I hold the Division of Air Quality in really high regard. And those that I've met personally and those that our organization HEAL Utah has worked with we found them to be absolutely consonant professionals. Many of whom have been working nights and weekends to try to solve this really big problem that we have. Furthermore, as I see it the Division of Air Quality is in a bit of an impossible situation. On the one hand they are expected to fix Salt Lake's considerable air pollution problem and on the other hand, as I perceive it, they have their hands tied so that they can't really go after the area's biggest industrial polluters.

So you may ask why. In my view it's because the pro-pollution lobby in this state is really powerful and that there is a sense that they could immediately go to the legislature and seek additional restrictions on our air quality staff and perhaps even seek to cut its budget if the DAQ is perceived to be requiring too much of these big polluters. So, it's a tough spot to be in. In view of those constraints I think that DAQ did a workman-like job to come up with a plan that we have today.

However, all of that being said, as a resident of Salt Lake I am still deeply disappointed by this plan. As you know the Salt Lake area fell out of attainment with healthy air standards established by the Clean Air Act back in 2009, several years ago. And the Clean Air Act says that we should have been back in attainment by 2014, next year. And yet our plan as it stands today has no hope of getting us where we need to be until at least 2019. And even then just barely and only under what we consider to be the most optimistic of circumstances.

Now the plan looks at how to cut emissions from all sectors but if you look at the details of the plan those emissions cuts come overwhelming from small businesses, from residence, and from drivers while at the same time the air pollution coming from industry as a whole will actually increase by 12%. Just to give a couple of examples, some of the biggest players out there will see dramatic pollution increases on the order of hundreds or thousands of tons per year. Some that stand out in that category are the Kennecott mine concentrator, the Kennecott smelter and refinery, Proctor and Gamble Paper Products, and Nucor Steel. These are just some examples.

Now the refineries are being required to take some additional measures in this plan. And we think that is definitely a step in the right direction. However, the plan still doesn't require these changes of the refineries until the last possible date, 2018, 2019. And still allows them to expand their production at a time when we are badly out of attainment and we think that just isn't right.

In order for us to fill confident that this plan would actually work we think it requires both deeper and swifter cuts from industrial polluters. And we are working with several other clean air groups and public interest groups to hire experts to further review those industrial pollution plans to look for more cuts. In order to do that and to give those experts a reasonable amount of time to do their job we have asked the Division of Air Quality for 30 additional days of time to make those comments. I understand the state does not want to miss the SIP submission date of January 1, 2014 and I would be more than happy to speak with DAQ staff about that offline.

I want to thank the Division of Air Quality for their work. You all have a tough job. You are performing admirably. And please know that we at HEAL Utah and our supporters are working to create an environment where the scales of power are tipped back in the direction of the public interest rather than where we feel they are now which is dangerously tilted towards the interest of polluters. Thank you.

John Knoblock

It's John Knoblock.

And I just have a, maybe a general thought which is I'm wondering if we have a good side by side publically available comparison of the Utah DAQ rules versus the South Coast Air Quality Management rules both for point sources and for area sources that show the cost effectiveness and dollar per ton for each of the rules and then any rules that we have not yet put on our books that we have not adopted. A good scientific explanation as to why we don't have those rules yet. I think that would go a long way to prevent us from reinventing the wheel. I do see that we have finally looked to California to try to get background and even wording for some of our rules such as char broilers and things. So you know that's great because we don't need to reinvent the wheel. The California folks have licked this problem to a substantial degree in the South Coast and the Bay Area decades ago. So, it's time that we don't reinvent the wheel and we lean on them a little bit more. It may identify some big gaps that we have in our rules such as vehicle fueling. When I moved from California here 15 years ago I was astounded to see that we don't have vehicle refueling vapor recovery that they perfected in and have had going for quite some time.

Another area that we could compare is our staffing levels. If we looked at the staff levels for both enforcement and air quality permitting folks for our staff compared to say the South Coast Air Quality or the BAAQMD folks. How many people do we have to get the job done? And I think that would be an interesting comparison because we obviously have serious problems but we have a fraction of the staff that those folks do. So it might help for the public and our politicians see that we are behind and it's tough to ask our DAQ to pull all this together with the limited amount of staff.

Another thing that we could do, one last comment, with respect to the tools that California South Coast Air Quality Management District and the Bay Area Air Quality

Management District have done is for large industry to use a cap basis so that they can look at the total emissions from a facility and set a cap on that. And then as those industries want to make changes to their facilities so that they can increase production go ahead and let them do that, they can increase production but they've got to keep their emissions under the cap. And then additionally, put in place things like new source review to put in new source performance standards that then kind of notch away and cut down that cap over time. So there are tools out there that the California folks have come up with that we need to borrow and I think that will help us get the job done. Thank you.

Carl Ingwell, U Student Air Network and Clean Air Now

Morning, thank you Kathy. My name is Carl Ingwell I'm here representing the U Student Clean Air Network and Clean Air Now.

I just wanted to thank the DAQ for all the work they've gone into in preparing this SIP. We, both of our groups, appreciate the hard work and dedication that they have shown over the last year or so.

I'd like to echo these sentiments from Utah Moms for Clean Air and HEAL Utah. Over the past year or so I have been working on a large project where I go out and a group of volunteers go out and we talk to residence along the Wasatch Front and throughout Utah about how air quality affects their lives. And one of the stories that we get back a lot is that people feel frustrated. People are frustrated that the messaging from UCAIR, the DAQ, the Clear the Air Challenge, etc., is asking people to make cut backs in their personal lives. And while they are trying to make these cut backs to positively influence air quality in the State of Utah, at the same time industry is going to be able to increase their pollution by 12% by 2019. I think it's insulting to the public of Utah that this is happening. That we are being asked to cut back on our share and industry is not being asked to cut back on their share. It's insulting that we're asked to cut back when they increase their pollution and increase their profits.

Like Utah Moms for Clean Air, we're asking for clean air now and that will require decreases from mobile, area, and point sources. Thank you.

Gabriel Lozada

Gabriel Lozada from the Economics Department at the University of Utah.

Because of Dr. Kelly's research we know that the category of wood and cooking is a very important component of PM2.5 in the Salt Lake airshed. But her research isn't able to distinguish between wood and cooking. And there is other research showing that cooking might be a quite important component of PM2.5. One example is an article in Journal of Air and Waste Management Association from 2007 study in Atlanta showing that the precursors for 2.5 in the summertime, meat was, meat cooking was 36% , gasoline was

21%, diesel was 20%, and in the winter wood was 50%, gasoline 33%, meat 5, and diesel 4. And so in both those cases meat cooking is a very important component. And this is mostly cooking red meat a char broilers. A 1998 study in the [word?] North Front Range had meat cooking at 6.3 and wood burning at 1.6.

Now I understand that the State of Utah is already, has new regulations for chain driven char broilers but it's the under fire char broilers that contribute 88% of PM2.5 emissions. The under fire char broilers aren't being regulated at all.

Now I understand it's pretty expensive to capture the emissions from under fire char broilers, but there are two other possibilities for the restaurants. They could switch to the chain driven char broilers, which it's not very expensive to control emissions from. Or we could have a regulation that they just not use the under fire char broilers during inversions.

So I urge you to consider those as possibilities for controlling a potentially quite important source of PM2.5. Thank you.

Thomas Plustwik

Good morning, thank you for having this forum and the ability that we can do something about our air quality, not just in Utah but pretty much the rest of the world. I am a Utah resident that is very concerned about the air quality. I've lived here for 12 years and I'm in the process of looking at leaving here. Not living here any further.

We can talk about caps and pollution limits and what have you but I have come up with a couple of potential solutions that really could reduce, not reduce but treat the poor air quality. So I am trying to find a forum where I can disclose that freely and speak with some engineers perhaps and see if these two ideas, they're pretty abstract, but they work on a small level and I know they'll work on a grand level. So I have, I have contact through various companies that can maybe look at my idea. I just haven't talked to them. So I was wondering whether I could talk to someone on the floor or to yourselves about what my concepts are.